



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

**VIA FACSIMILE and**  
**FIRST CLASS MAIL**

May 29, 1997

James Bopp, Jr., Esq.  
Bopp, Coleson & Bostrom  
2 Foulkes Square  
401 Ohio Street  
P.O. Box 8100  
Terre Haute, IN 47808-2434

RE: MUR 3774

Minnesota Citizens Concerned for Life, Inc.  
Minnesota Citizens Concerned for Life  
Committee for a Pro-Life Congress

Dear Mr. Bopp:

We are in receipt of your clients' -- Minnesota Citizens Concerned for Life, Inc. ("MCCL") and Minnesota Citizens Concerned for Life Committee for a Pro-Life Congress ("MCCL PAC") -- responses of April 16, 1997 to the Commission's Subpoenas and Orders. Upon review, it appears that your clients' responses concerning their "Citizen's Action" projects and 1994 phone bank activity require clarification or additional information. In response to interrogatory number one, MCCL states that it has not conducted any voter identification programs, but instead conducts "Citizen's Action" programs, and apparently based on this characterization provides no responsive documents to related document request number five. However, MCCL's response indicates that the "Citizen's Action" projects use voter registration lists to identify pro-life voters. Consequently, please provide all documents relating to such projects as requested in document request number 5.

In response to document request number six, MCCL produced a series of documents ("Exhibit B") referencing the 1994 phone bank activity conducted through Optima Direct, Inc. Among these documents is a November 17, 1994 memorandum from Matt Sottong to Jackie Schweitz, which appears to have been transmitted via facsimile on the same date at approximately 11:53 a.m. This memorandum references several enclosures, including "sheets" indicating the total calls placed per legislative district; yet, your client's production only includes one enclosure entitled "Response Data Legend," designated as page three of the facsimile. Please produce all pages included in this facsimile transmission. If these documents are not available, describe in detail each missing page of the facsimile transmission. Similarly, your

client produced an invoice from Optima Direct, Inc. designated "invoice 6218," which was transmitted via facsimile later the same date, at 4:45 p.m. This invoice is designated as page two of the facsimile. Produce all pages included in this facsimile transmission. If these documents are not available, describe in detail each missing page of the facsimile transmission.

Further, the Optima Direct, Inc. invoice (#6218) discloses an initial deposit of \$50,000 for this phone bank activity. This invoice also discloses that a separate invoice (#6154) was issued for the deposit transaction. However, despite being clearly responsive to the Subpoena and Order, no documents concerning this deposit were produced. Please produce the corresponding invoice along with a copy (both sides) of the check(s) for payment of the deposit. If these documents are not available, state the date(s) when the deposit was made and identify by bank name, holder and account number the account from which the payment was made. Also, state if this payment was made from funds received by your clients from the National Right to Life Committee.

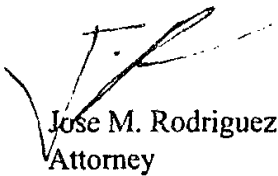
MCCL PAC's submission to document request number six includes a series of fifteen telephone scripts which upon comparison appear to correspond to the phone bank activity disclosed in the Optima Direct documents produced by MCCL and the Life-Tel, Inc. documents produced by MCCL PAC. Please confirm that these scripts were in fact the scripts used for the 1994 phone bank activity conducted by your clients through Optima Direct and Life-Tel.

Concerning your clients' financial information, in response to the Commission's Subpoena and Order your client MCCL has refused to produce requested limited bank account information based on non-specific scope and confidentiality objections. Because your client has provided no legally sustainable basis for refusing to provide the bank account information sought by the Commission, we now restate our request for production of all bank statements for all bank accounts held by MCCL from October 1, 1994 through January 1, 1995.

Last, both MCCL's and MCCL PAC's responses name certain individuals who have not been previously identified. These individuals are Mary Schmit, Tam Helmin, Kathi Roberts, Christina Diaz and Ruby Kubista. Please identify these individuals by providing their positions, titles and duties at MCCL and MCCL PAC from 1992 through 1994 and by providing their current business and personal addresses in accordance with the Subpoena and Order instructions.

We request that your clients submit responses to these discovery requests within five business days of receipt of this letter. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,



Jose M. Rodriguez  
Attorney